

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

ANGELA STEWART,)	Case No. 3:20-cv-00679
)	
Plaintiff,)	Judge: Hon. Aleta A. Trauger
)	
v.)	JOINT MOTION TO EXTEND
)	DEADLINE TO AMEND
HEALTHCARE REVENUE)	PLEADINGS
RECOVERY GROUP, LLC,)	
)	
Defendant.)	
)	

Plaintiff Angela Stewart (“Plaintiff”) and Defendant Healthcare Revenue Recovery Group, LLC (“Defendant”) (collectively, the “Parties”) respectfully submit this motion to extend the deadline to amend the pleadings. In support, the Parties respectfully states as follows:

1. On September 24, 2020, the Court entered its Case Management Order setting forth a January 15, 2021 deadline to amend the pleadings. Doc. 16.
2. On November 9, 2020, Plaintiff served Defendant with her first set of written discovery requests.
3. Shortly after Defendant served its objections and answers to Plaintiff’s requests on December 14, 2020, a discovery dispute arose between the parties.
4. Defendant has agreed to supplement its responses on or before January 8, 2021.

5. The parties respectfully request that the deadline to amend the pleadings be extended by 14 days to allow the parties to conduct sufficient discovery to ascertain whether the operative pleadings need to be amended.

6. Good cause exists to extend the deadline to amend the pleadings.

7. This request for an extension is not made for any dilatory purpose, but rather to potentially conserve the resources of the parties, and of the Court.

WHEREFORE, the parties respectfully request that this Court extend the deadline to amend the pleadings to January 29, 2021.

Dated: December 22, 2020.

Respectfully submitted,

/s/ Amorette Rinkleib

Amorette Rinkleib (*pro hac vice*)

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CERTIFICATE OF SERVICE

I certify that on December 22, 2020, I filed the foregoing document with the Court using CM/ECF, which will send notification of such filing to all counsel of record.

/s/ Amorette Rinkleib
Amorette Rinkleib